



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

MAR 18 2010

Ramiro Villalvazo
Forest Supervisor
Eldorado National Forest
Big Grizzly Project
100 Forni Road
Placerville, CA 95634

Subject: Draft Environmental Impact Statement for the Big Grizzly Forest Health
and Fuels Reduction Project, Placer County, California (CEQ# 20100027)

Dear Mr. Villalvazo:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above project. Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

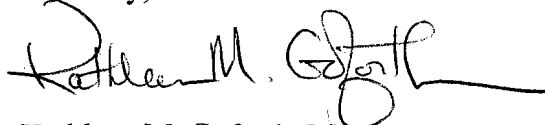
EPA acknowledges the importance of the project's goals to improve forest health, reduce fuel loading, and decrease fuels along important access roads to allow better access for fire suppression activities during fire events. We support the use of thinning and prescribed underburning as important measures necessary to reduce the risk of fire, promote biodiversity, and restore natural ecological processes within the forest. We recognize the ecological significance of the Eldorado National Forest and support the inclusion of the resource protection measures and best management practices described in the DEIS. Project features such as limiting the amount of new road construction will help minimize adverse effects. Overall, the DEIS contains valuable information useful to both the public and decision maker(s); however, we have some concerns that should be addressed in the Final Environmental Impact Statement (FEIS).

We have rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "*Summary of Rating Definitions*"). EPA thanks the Forest Service for writing a well-organized document with a clear project description and purpose and need section; however, we recommend the FEIS provide additional information on air quality emissions and climate change, and commit to Best Management Practices (BMPs). Our enclosed detailed comments provide additional information regarding the concerns identified above.

We appreciate the opportunity to review this DEIS and are available to discuss our comments. When the FEIS is released for public review, please send one hard copy

and one CD to the address above (mail code: CED-2). If you have any questions, please contact Stephanie Skophammer, the lead reviewer for this project, at (415) 972-3098 or skophammer.stephanie@epa.gov or contact me at (415) 972-3521.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen M. Goforth", with a long horizontal flourish extending to the right.

Kathleen M. Goforth, Manager
Environmental Review Office

Enclosures: Summary of EPA Rating Definitions
Detailed Comments

EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR THE BIG GRIZZLY FOREST HEALTH AND FUELS REDUCTION PROJECT, PLACER COUNTY, CALIFORNIA, FEBRUARY 5, 2010

Air Quality

Provide details describing the CAA General Conformity requirements and the Placer County Air Pollution Control District's Smoke Management Plan. The DEIS states that Placer County is in Federal non-attainment areas for ozone and that standards have been set for ozone precursors: volatile organic compounds (VOC) and nitrogen oxides (NOx) (pg. 170). The proposed Big Grizzly project includes prescribed burning and logging activities that could result in air emissions of VOC and NOx, as well PM₁₀. In accordance with the Clean Air Act (CAA) General Conformity requirements, in federal non-attainment and maintenance areas, a determination must be made that emissions will not exceed the applicable *de minimis* threshold levels, measured in tons per year, for criteria pollutants of concern. If emissions would exceed an applicable *de minimis* threshold, a conformity determination is required to document how the federal action will affect the State Implementation Plan (SIP). The Draft EIS (p. 170) indicates that the total tons of NOx that could be emitted by prescribed burning could exceed 10 tons. The *de minimis* threshold for NOx in extreme non-attainment areas is 10 tons per year. The document does not discuss the status of the non-attainment areas encompassed by the project, the time period for these estimated NOx emissions, and whether or how the proposed project would conform with the SIP.

Recommendation: The Final EIS should describe the CAA General Conformity requirements and discuss whether and how the proposed action would comply with the SIP and State and local air district regulations. If a General Conformity determination is necessary, we recommend it be included in the FEIS. The FEIS should also include a more detailed description of the Placer County's regulations for pile burning and smoke management, an implementation schedule, the responsible parties, and monitoring and reporting requirements.

Climate Change

Describe climate change and its effects on successful reforestation. Current research indicates that climate change could impact the amount, timing, and intensity of rain and storm events; increase the length and severity of the fire season; modify the rate and distribution of harmful timber insects and diseases; and aggravate already stressed water supplies. A significant change in the weather patterns could have important implications for how we manage our forests. A number of studies specific to California have indicated the potential for significant environmental impacts as a result of changing temperatures and subsequent environmental impacts.¹ The California Climate Action Team released a report² on the impacts of climate change to California, the latest research, and state efforts to adapt to impacts. The report indicates that estimates of the

¹Our Changing Climate: Assessing the Risks to California, A Summary Report from the California Climate Change Center, July 2006.

² Draft 2009 Climate Action Team Biennial Report to the Governor and Legislature. See internet address: <http://www.climatechange.ca.gov/publications/cat/index.html>.

long-term risk of large wildfires in California are substantial, with increases in occurrences statewide ranging from 58% to 128% in 2085.

One objective of the project is to prevent the occurrence of large uncontrolled wildfires that result in high levels of GHG. EPA recommends that the Forest Service consider the potential effects of climate change on Forest Service resources and describe how the Forest Service will adaptively manage affected resources. For example, the likelihood of larger and more frequent wildfires could increase erosion, sedimentation, and chemical and nutrient loads in surface waters, resulting in adverse impacts to water quality and quantity as well as species diversity.

Recommendation:

We recommend the FEIS include a more detailed description of climate change and the implications for successful reforestation. For example, describe and evaluate projected climate change impacts on the frequency of high intensity storms, magnitude of rain events and severity and frequency of insect outbreaks, droughts, and fire seasons, and their effects on the success of reforestation efforts.

Water Resources

Include a commitment in the Record of Decision (ROD) to the Best Management Practices (BMPs) listed in Appendix B. EPA commends the Forest Service for including a detailed list of BMPs in Appendix B of the DEIS that specifically address soil and water quality in the Big Grizzly Project area. Appendix B states that the BMPs listed will be implemented in the Big Grizzly Project Area if an action alternative is selected (B-1).

Recommendations:

EPA recommends that the ROD include a commitment to the specific BMPs that will help to reduce water quality impairment. These include erosion prevention and control structure maintenance as well as pesticide application and monitoring evaluations.